

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. WALLACE TANG, Individually, and d/b/a BLUE SKY ENGINEERING, INC.; CASSINDY SINE CHAO, Individually, and d/b/a LASERLITH CORP.; and GINA KIM, Individually, and d/b/a BLACK HILLS NANOSYSTEMS CORP.; Defendants.	4:19-CV-04029-KES DEFENDANTS' DISCOVERY REPORT
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COME NOW the Defendants in the above-captioned action, by and among their respective counsels of record, and hereby submit this Discovery Report of the court-ordered meeting required pursuant to Fed. R. Civ. P. 26(f). Defendants are filing separately because the United States declined to include the following sentences in the last paragraph of Item 4: "Defendants further posit that the identity of a corporate officer entering a guilty plea on behalf of an entity is of no legal significance in a civil matter. The Government's insistence on mentioning the identity of the corporate officers is misleading." Ms. Chao and Ms. Kim did not individually plead guilty to any criminal offenses in this matter. Nor were they ever charged with having committed any criminal

offenses. The parties agreed to the remainder of the discovery plan as detailed in the Discovery Report the United States filed.

**ATTORNEYS FOR WALLACE TANG AND
BLUE SKY ENGINEERING, INC.**

Date: June 23, 2020.

A handwritten signature in blue ink, appearing to read "TBillion", is written over a horizontal line.

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